

EXHIBIT 1

WILL GRANNIS
October 29, 2020

1

1 - WILL GRANNIS -

2 IN THE UNITED STATES DISTRICT COURT
3 FOR THE SOUTHERN DISTRICT OF NEW YORK3 ----- X
4 ULKU ROWE,

5 Plaintiff,

6 Case No.
7 19 Civ. 08655 (LGS) (GWG)

8 v.

9 GOOGLE LLC

10 Defendant.

11 DATE: October 29, 2020

12 TIME: 11:33 A.M.

13
14 VIDEOTAPED VIDEOCONFERENCE DEPOSITION
15 OF WILL GRANNIS, held via Zoom, pursuant to
16 Notice, before Hope Menaker, a Shorthand Reporter
17 and Notary Public of the State of New York.

18

19

20

21

22

23

24

25

1 - WILL GRANNIS -

2 time.

3 Q. Do you recall what your level was?

4 A. L 8.

5 Q. Do you recall what job ladder that
6 was in?

7 A. Program management.

8 Q. When was your start date?

9 A. It was the end of March, '2015
10 approximately.

11 Q. And how long were you in that role?

12 A. It was roughly a year.

13 Q. And where did you go next?

14 A. My next role was starting the office
15 of the CTO.

16 Q. And how did it come to be that you
17 made a move into the office of the CTO?

18 A. I was asked to formulate -- because
19 of my background in enterprise technology both in
20 startups and in large enterprises, I was asked to
21 provide thoughts and opinions to leadership around
22 building such a function.

23 And at the time I was told based on
24 high performance in the role, demonstrated
25 knowledge of the products and, you know,

1 - WILL GRANNIS -

2 firsthand -- real firsthand experience whether it
3 was hands-on or leadership that we would make -- I
4 was offered to start this role up and at the time
5 it was scoped to be a very small thing and an
6 experimental function.

7 Q. What was the title or descriptive
8 title of that role?

9 A. Director, office of the CTO.

10 Q. Did that role include an engineering
11 component?

12 A. Yes, the -- eventually. So part of
13 creating a team was -- actually was also creating
14 the -- the features of the -- the function itself.
15 It was a new function at Google.

16 Q. And did that function gain a name?

17 A. Yes.

18 Q. And what was the name?

19 A. The Office of the CTO was the name of
20 the group and the function, we decided to utilize
21 a technical job family that had been used
22 elsewhere in Google and put it in engineering for
23 the first time.

24 Q. What do you mean, "put it in
25 engineering"?

- WILL GRANNIS -

A. Our job families can exist. So the job family that was used for the office of the CTO had certain elements that we wanted to bring across and we knew that engineering, the core of the team would be critical to have engineering skills.

And so we took the features of a job that allowed for a blend of customer facing, customer impact-type work, plus engineering-type work and we put it in engineering, meaning it was in the engineering hierarchy which allow the members of the team to participate in the larger engineering organization whether that was, you in, you know, developing or in more engineering-like reviews.

Q. Was -- the technical job family you -- you talked about, was that technical solutions consultant?

A. Yes.

Q. And so there were technical solutions consultants outside of OCTO at the time you adopted that title?

A. We don't -- we don't refer to technical solutions consultant and the job family

1 - WILL GRANNIS -

2 detail, so it will probably help. OCTO, the job
3 family as seen in the job description and in OCTO
4 as we've described since the very beginning of the
5 CTO office, the role consists of three main we'll
6 call them buckets of work. There's customer work,
7 there's influencing the platform and products, and
8 then there is the speaking, the evangelism part.

9 In order to create impact with the
10 customer OCTOs are expected to help materially
11 advance the progress of the largest brands in the
12 world; and what I mean by that is, you know, come
13 to Cloud, come to Google Cloud and succeed with
14 Google Cloud.

15 The second pillar, the engineering
16 pillars, are expected to take their knowledge from
17 the corporate world and what they obtain at Google
18 and they're expected to show impact on the product
19 road map, and this can come in a variety of
20 fashions. Most often this means that they have
21 championed a change that we need make to what
22 we're building that it is accepted by the
23 engineering, production, leadership.

24 And the third pillar is conveying the
25 power of our technology to the outside world

1 - WILL GRANNIS -

2 and helping create a translation between our
3 technology and its possibilities in the context of
4 the day; and in this way Ulku for example spent
5 most of her time explaining the power of
6 technology to financial services organizations and
7 regulators, organizations like that externally.

8 Q. So we'll come back to some of this.

9 With respect to the second bucket,
10 influencing the platform products and the
11 engineering piece -- do I have that right, that's
12 the second bucket?

13 A. Yes.

14 Q. Describe for me a little bit more
15 about the engineering aspect of -- of the role,
16 what it means to impact -- have an impact on the
17 product road map.

18 A. Examples of impact can range from
19 conceiving of a design of a new product and
20 ensuring that it's built. It can be spotting an
21 opportunity to evolve something that we already
22 have and make it better.

23 And it -- I think it's critical to
24 point out that the idea itself is only a little
25 bit of the role, that the -- the full as, you

- WILL GRANNIS -

Q. What was the context of that transfer; why was he being transferred?

MR. GAGE: Objection.

A. He wanted to lead a production engineering team, something we don't do in OCTO.

Q. So he was being transferred from the technical director Eng role into an SWE Eng role?

MR. GAGE: Objection.

A. I'm -- I'm just reading this again just cause I -- I've never seen this before.

Yes, TSE to SWE manager.

Q. And did you support this transfer?

A. Yes.

Q. And did you view his skills in TSC as transferrable to SWE?

MR. GAGE: Objection.

A. Some of them.

Q. And what skills are transferable?

A. It's more about the -- it's more about the job family, and let me explain. The job family -- technical solutions consultant, we described earlier the three pillars of this role. The pillars are customer, evangelism, and engineering. In the SWE ladder, software

- WILL GRANNIS -

engineering ladder, customer and evangelism aren't present in the pillar requirements.

So the skills that are transferable are engineering, but that ladder doesn't recognize the skills of large-customer advancement and evangelism as val -- as core valuable pieces of their job description.

Q. Are there aspects of the skills that someone would have with respect to Pillars 1 and 3 in TSC that would be skills that could also be used with respect to a manager in SWE?

A. The three OCTO pillars, the first and third pillars would be largely negligible to transfer to a SWE manager.

Q. Understood. The pillars describe the responsibilities of the TSC, is that a fair way to characterize that?

MR. GAGE: Objection.

A. Responsibilities, skills, background, experience necessary, yes.

Q. Okay. So, for instance, thought leadership might be a skill that's relevant to the first and third pillars, correct?

MR. GAGE: Objection.

- WILL GRANNIS -

A. Mostly -- mostly the third, but
some -- somewhat in the first, yes.

Q. Okay. Do you see thought leadership and evangelism as interchangeable or as different -- different things?

MR. GAGE: Objection.

A. They are slightly different skills.

Thought leadership is the ability to take a situation, use experience, knowledge, what you learn and be able to advance a -- a situation or an area that quite often others don't believe or don't agree with. Evangelism is purely the act of communicating externally on behalf of something.

Q. Okay. We looked earlier at that engineering levelling guide --

A. Uh-huh.

Q. -- do you recall that?

A. I do.

Q. With -- with respect to the items that were contained on the engineering levelling guide, and if you need to we can go back to that document, but is it your understanding that those items are items that apply both to TSCs and to SWEs?

- WILL GRANNIS -

MR. GAGE: Objection.

A. Somewhat, but that's also why we have job families that are more descriptive in terms of requirements.

Q. I want to make sure I'm directing you, give me one moment. Okay, let's go back and look at that. It's Exhibit 6.

A. Okay.

MR. GAGE: Is this already there

Or --

MS. GREENE: It's there.

MR. GAGE: Exhibit 6, Adam Lief, this one?

MS. GREENE: Yes.

A. I have it up.

Q. Okay. If we can look at the last -- Page 2, the entries for Level 8 and Level 9, are there any entries there that you would say do not apply to technical directors?

MR. GAGE: Objection.

A. And was the question are there any that don't explicitly apply?

Q. That you would say well, this isn't relevant with respect to the TSC ladder or roles.

- WILL GRANNIS -

A. None that immediately jump out as defined.

Q. Okay, and with respect to a SWE, are there any here that you would say as far as you understand the role of SWE do not apply to SWE?

MR. GAGE: Objection.

A. In the category of leadership, I think that these would -- these would apply.

Q. Okay. Well, just so I'm clear: If we go all the way back up to Page 1, there's four levelling criteria; knowledge and experience, complexity and scope, leadership and influence, and organizational impact. Do you see that?

A. I do.

Q. Okay. So with respect to Levels 8 and 9, do each of those categories in this document apply to SWE?

A. Well, it says just up in the header "It's not a representation of expectations for any specific ladder," so I think the answer is no.

Q. So I'm asking you based on what you know about the SWE role and as you've observed it in operation, do these generally describe attributes of someone at the Level 8 and/or Level

- WILL GRANNIS -

OCTO?

A. Yes.

Q. Do you know who Jonathan Donaldson is?

A. Yes.

Q. Is he another person who you hired into the technical director position in OCTO, that position we saw in the job description we looked at earlier?

A. Yes.

Q. What about Paul Strong, do you know who he is?

A Yes

Q. Is he someone else you hired as a technical director within OCTO?

A Yes

Q. And I -- I still have not figured out how to say his name. Eyring Eyringek?

Λ Εργασίες

Q. Yes. Is he another person that you
hired in as a technical director within OCTO?

$$\sum_{i=1}^n \alpha_i = 1$$

Q. Now, at some point did Evren transfer

- WILL GRANNIS -

A. When he left OCTO he went into a probationary product management role, that's correct.

Q. PM stands for Product Management?

A. Yes.

Q. So he had skills that were transferable from TSC to PM?

A. That's why he was put in a probationary period, was to determine whether that was true or not.

Q. And do you know the outcome of that?

A. He's a product manager today, so...

Q. Okay, and with respect to the engineering levelling guide that we looked at a bit ago with respect to Levels 8 and 9 in those four different categories for the PM manager role as you observed it at Google, do these descriptors apply to that ladder?

A. Generally, yes, but again as states in the doc it doesn't represent the specific expectations for any job role including PM, SWE, or TSC.

Q. Right. This is an Engineering-Wide
Levelling Guide?

- WILL GRANNIS -

A. Yeah, this is -- yeah, there's an engineering category of jobs and then the job families, so this is for an engineering category of jobs.

Q. So this is the -- the broader set and then an individual ladder may have its own levels defined as well, correct?

A. Yes.

Q. And so earlier we looked at this when we discussed the TSC ladder itself was well, correct?

A. Yes.

Q. All right. Do you know a woman or aware of a woman named **REDACTED** ?

A. Yes.

Q. And how are you aware of her?

A. She was being considered for a role in OCTO.

Q. And was she offered a role?

A. She was.

Q. And do you recall at what level she was offered a role?

A. I think it was L 9, but I'm not a hundred percent sure.

- WILL GRANNIS -

that into another role there's always going to be pieces that are applicable and pieces that aren't; and in our case, we index heavily towards engineering in OCTO. That's why we took the job family and moved to it engineering. That's why we have many, many hiring steps around validating technical skills. That's why over time it's one of the priorities for people within the team.

And considering that Tariq was building an organization that was in sales, a sales or a business development-like function, my assumption was that the engineering pieces of what we do might be a little bit devalued, and since that's such a core of OCTO, there was certainly going to be some of that same translation difficulty.

Q. Did you have a conversation with Mr. Shaukat about the vertical lead?

A. Not directly.

Q. Did you have a conversation with Mr. Stevens about the vertical lead around this time

A. I presented my opinions.

Q. And did you present Mr. Stevens with an opinion with respect to Ms. Rowe's

- WILL GRANNIS -

leans hire, would you have recommended hire for the role?

MR. GAGE: Objection.

A. I -- I would have needed -- yeah, I would have needed to know more about the roles.

As I stated earlier I never saw a job description. I never saw a key criteria. I never saw any of the things that would allow me to make a specific recommendation.

Q. Based on -- did I understand your testimony earlier with respect to the pillars and Ms. Rowe's general performance, that you considered her to be strong on the -- the business side with respect to financial services?

A. A little more specifically I -- we should we should definitely check, but what I wanted to make sure was articulated is that the three pillars of OCTO are not business -- there's no business pillar. There's a customer pillar, there's a technical engineering pillar, and then there's an evangelism pillar.

Evangelism has been Ulku strongest area throughout her time, but I was her manager and that's recorded in performance reviews.

- WILL GRANNIS -

The pillar that would come next in terms of performance level would be the customer, but that's not necessarily dependent on business savvy, sales savvy, business development savvy; it's actually based on understanding problems in that industry of a general technology nature.

And then the third bucket of engineering is the area where she's had the lowest performance consistently over the three years, three-plus years.

Q. And that customer component includes understanding the underlying business of the customer, in this case financial services; is that -- am I right about that?

A. Somewhat, but that is not the extensive requirement. The difference between an OCTO role for example and a position that's in a sales or business development just -- remember when we talked about the -- kind of the job umbrellas or the job categories earlier; we had engineering, we had sales, you know, we had administrative, general administrative. Those are the three types.

In sales there's higher emphasis on

- WILL GRANNIS -

Q. -- or did the people you evaluated fall within a certain category?

A. I'd have to look at the --

MR. GAGE: Objection.

A. I'd have to look at the data to give you a definitive answer.

Q. Was a 5 a regular occurrence or would that be more unusual for someone to be 4 to 5?

A. Statistically the least likely ratings are the poles, as you would expect the -- the extremes, the needs improvement, and the superb.

Q. Did Google apply any sort of Bell Curve to -- or fourth-ranking process to its evaluation rankings?

A. No, people were allowed to earn the score that they earned.

Q. With respect to Ms. Rowe's performance evaluation that you completed, were you accurate or did you strive to be accurate in terms of the feedback and assessment that you provided in those reviews?

A. Yes, it's absolutely critical for the functioning of the team; and as an example Ulku

- WILL GRANNIS -

performed well in the one-to-one and one-to-many, but did not perform well in engineering which is why her rating was not higher.

Q. Did she do anything on that pillar?

MR. GAGE: Objection.

A. I'd have to --

MR. GAGE: In this particular year or

MS. GREENE: Ever.

A. Very little. Consistently if you over the span of her performance years, all notice a very consistent pattern and that lack of meaningful impact in engineering.

In her late -- latest performance review which we just actually had this week it was pointed out that she has started some efforts that might be promising, but we don't grade on intent, we grade on impact and Ulku has yet to demonstrate any significant impact in the engineering pillar.

Q. And what -- you mentioned in this year's review, what -- what review did you give in this last have evaluation, what scores?

A. I think exceeds expectations. An OCTO is limited in their ability to score high

- WILL GRANNIS -

on -- on the rating if they're not fulfilling one of the pillars on the job.

Q. Give me just a moment.

Okay. After Ms. Rowe joined Google, did she raise concerns with you about her level?

A. The time when I remembered most specifically was in the transition to the vertical organization, when she was asking about the correspondence that we -- that we talked about earlier.

Q. Are you aware that in the fall of 2018, she raised with Kevin Lucas and Melissa Lawrence concerns about her levelling and that men had been leveled higher than her?

MR. GAGE: Objection.

A. I'm -- I'm not aware of the timing or the nature of the concerns, but I am aware because I had a discussion with employee relations that there was a general concern.

Q. When was that discussion with employee relations?

A. I don't remember off the top of my head.

Q. Was it after she was back in OCTO or